



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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September 14, 2018

Honorable Denise Cote
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007

Re: SEC v. Alpine Securities Corporation
Case No.: 1:17-CV-04179-DLC

Dear Judge Cote:

Pursuant to the Court’s Individual Practices 4.A and 3.D and the Court’s Order dated July 12, 2018 (“Order”), Plaintiff the Securities and Exchange Commission (“Commission”) submits this request to file sealed exhibits in support of its Reply Memorandum of Law in Support of its Motion for Summary Judgment on Liability (“Reply”).

The Commission requests permission to submit exhibits under seal, specifically exhibits numbered 1-6. The Commission requests permission to submit exhibits 1-6 under seal because they include a deposition notice (exhibit 1), deposition excerpts (exhibit 2), and tables (exhibits 4-6), that contain information indicating the existence of SARs, describe the content of SARs, contain identifying information regarding the subjects of SARs, and/or are otherwise subject to the protective order in this case. [Doc. 38]. The strict confidentiality provisions applicable to SARs under the Bank Secrecy Act and its implementing regulations generally preclude both “financial institutions” and governmental entities from disclosing “to any person involved in the transaction that the transaction has been reported.” 31 U.S.C. § 5318(g)(2)(i)-(ii); *see also* 31 C.F.R. § 1023.320(e) (“A SAR, and any information that would reveal the existence of a SAR, are confidential”).

The Commission will submit digital copies of these materials via email and deliver hard copies of the same materials directly to the Court’s chambers.

Accordingly, the Commission requests that the Court permit the Commission to submit the sealed exhibits described above and submitted to the Court's chambers.

Sincerely,

/s/ Terry R. Miller

Zachary T. Carlyle (*pro hac vice*)
Terry R. Miller (*pro hac vice*)

cc: All counsel of record